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REMARKS

Claims 1-84 were originally presented in the subject application. Claims 3, 11, 16, 31, 39, 44, 59, 67 and 72 were amended, and claims 85-112 added in an Amendment and Response to Office Action dated November 17, 2004. Claims 1, 29, 57 and 85 were amended in an Amendment and Response to Office Action dated April 28, 2005. Claims 1, 29, 57 and 85 have herein been amended to more particularly point out and distinctly claim the subject invention. No claims have herein been added or canceled. Therefore, claims 1-112 remain in this case.

The addition of new matter has been scrupulously avoided.

Applicants respectfully request entry of these remarks, and reconsideration and withdrawal of the grounds of rejection.

37 CFR 1.105 Requested Information

In response to numbered items 2 and 3 in the Office Action, Applicants submit the following statement: Other than the PR Newswire item, no information about what was demonstrated at the SPPHIRE conference is known or could readily be obtained.

In response to numbered item 4 in the Office Action, no use of the claimed invention known to the inventors at the time of filing the application was identified.

Finally, in response to numbered item 5 in the Office Action, as noted in the Background and Summary of the application, the present invention provides secure communications between public and private electronic environments in real time. Such aspects are reflected in the claims, and the differences with the cited art are more particularly pointed out in the remarks below.

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35 U.S.C. §102 Rejection

The Office Action rejected claims 1-7, 10, 11, 14-17, 22-27, 29-35, 38, 39, 42-45, 50-55, 57-63, 66, 67, 70-73, 78-83, 85-91, 94, 95, 98-101, and 106-111, under 35 U.S.C. §102(b), as allegedly anticipated by ERPNet, as Dialog File 20, accession No. 02821200. Applicants respectfully, but most strenuously, traverse this rejection.

With respect to an anticipation rejection, it is well settled that a claimed invention is not anticipated unless a single prior art reference discloses: (1) all the same elements of the claimed invention; (2) found in the same situation as the claimed invention; (3) united in the same way as the claimed invention; (4) in order to perform the identical function of the claimed invention.

*ERPNet*

Amended claim 1 recites, for example, causing a reply to the communication to be produced within the private electronic environment in real time.

Applicants could find no disclosure, teaching or suggestion in ERPNet of obtaining a reply within a private electronic environment in response to a user communication *in real time*. In addition, the Office Action fails to even mention the real-time aspect of the claims, nor cite to any section of ERPNet as allegedly disclosing, teaching or suggesting the same.

Therefore, Applicants submit that claim 1 cannot be anticipated by, or made obvious over, ERPNet.

Claims 29, 57 and 85 contain a limitation similar to that argued above with respect to claim 1. Thus, the arguments made above regarding claim 1 are equally applicable thereto. Therefore, claims 29, 57 and 85 also cannot be anticipated by, or made obvious over, ERPNet.

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*Gralla*

The Office Action also rejected claims 1, 29, 57 and 85 under 35 U.S.C. §102(b), as allegedly anticipated by Gralla, "How the Internet Works." Applicants respectfully, but most strenuously, traverse this rejection.

Amended claim 1 recites, for example, automatically routing a communication from a user in the public electronic environment to the private electronic environment. Against this aspect of claim 1, the Office Action cites to Gralla at page 263, step 4. However, Applicants submit that the transaction server is referred to in Gralla as "the site's," and the information is said to be sent "from the customer's computer to the ... transaction server ... over the internet ... [and] encrypted[.]" Thus, Applicants submit that the communication from the user to the transaction server is not being routed to a private electronic environment.

Amended claim 1 also recites, as another example, causing a reply to the communication to be produced within the private electronic environment in real time. Against this aspect of claim 1, the Office Action cites to Gralla at page 263, step 5. However, Applicants submit what is actually sent from the transaction server to the credit card company is a new inquiry regarding the users credit card number that is generated by the transaction server. Thus, the reply from the credit card company is not a reply to the user communication, but a reply to the newly generated inquiry from the transaction server.

Finally, amended claim 1 also recites automatically returning the reply from the private electronic environment to the public electronic environment. Against this aspect of claim 1, the Office Action cites to Gralla at page 263, step 6. However, Applicants submit there is no disclosure, teaching or suggestion that the reply from the credit card company goes anywhere but to the transaction server, and does not go out onto the Internet. Thus, even ignoring the fact that the reply is not a reply to the user communication, in any case it is never returned to the public electronic environment, as claimed.

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Therefore, Applicants submit that claim 1 cannot be anticipated by, or made obvious over, Gralla.

Claims 29, 57 and 85 contain limitations similar to that argued above with respect to claim 1. Thus, the arguments made above regarding claim 1 are equally applicable thereto. Therefore, claims 29, 57 and 85 also cannot be anticipated by, or made obvious over, Gralla.


### CONCLUSION

Applicants submit that the dependent claims are allowable for the same reasons as the independent claims from which they directly or ultimately depend, as well as for their additional limitations.

For all the above reasons, Applicants maintain that the claims of the subject application define patentable subject matter and earnestly allowance of claims 1-112.

If a telephone conference would be of assistance in advancing prosecution of the subject application, Applicants' undersigned attorney invites the Examiner to telephone him at the number provided.

Respectfully submitted,

  
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